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NOTES OF CASES.

Husband as a Visible Means of Support.—A conviction of vagrancy was reversed when the Court of Appeals of Georgia reviewed the case of *Brown v. State*, 79 Southeastern Reporter, 1133. It appears that the accused was a married woman, but it seems that her husband was not properly supporting her. The court held that she had that "visible means of support," the alleged absence of which was the ground of her conviction. In disposing of the case, it was said: "It is punishment enough for a woman to espouse a man unwilling to support her. * * * Certainly she is not to be classed as a vagrant merely because she relies upon compliance by her husband with the obligation imposed upon him by law. Married women are often compelled to supplement the income which the ostensible head of the family can earn; but they do this from stern necessity, and not because the law compels them to do it. * * * In the present state of the law, the burden of supporting the family falls upon the husband, in return for which the law crowns him with the proud, but sometimes meaningless, title of 'head of the family.' If he would wear the crown, he must bear the burden. Some day all this may be changed; but we are dealing with present-day law, and 'sufficient unto the day is the evil thereof.'"

Color of Title and Effect of Washing Away of Land.—It is provided by statute in Iowa that one may recover from the owner of land for expenditures made for improvements thereon, provided that the property at the time was being held in good faith under color of title. Plaintiff in the present case obtained his color of title by way of a deed at a tax sale. Subsequently to this, however, a river that flowed adjacently to the land in question cut away parts of the property, thereby necessarily rendering the description of it as previously made in the tax deed much at variance with the present situation. In plaintiff's action for the improvement expenditures, the defense was interposed that the color of title was defective because of this discrepancy in the tax deed. The Iowa Supreme Court held, in effect, that the fact that the property described by the deed had been washed away by the river and other land deposited in the same place would not prevent the deed from being color of title. *Benton v. Dumbarton Realty Company*, 143 Northwestern Reporter, 586.

Refused to Accept His Pardon.—This case comes up upon the presentment of the grand jury for contempt. The respondents, city editor and a reporter of the New York Tribune, refused to answer questions regarding the sources of their information which was the basis of certain articles in that newspaper. They contended that